



MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/ko/141 DATE: January 31, 2008

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Status Report # 27 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated Federal On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twenty-seventh Monthly Status Report is December 17, 2007, through February 1, 2008.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 26 was submitted to U.S. EPA on December 26, 2007.

In Section 1.1 of Status Report # 26, it was incorrectly stated that preliminary data reports would be included as Appendix D (December 10, 2007 Soil Sample) and Appendix E (December 10, 2007 Liquid Sample) of the report. The finalized Analytical Reports are included as Appendix H and Appendix I, respectively, of Status Report #27.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities performed during the reporting period were primarily related to the tasks completed in December of 2007 (waste shipment, and Status Report submission) and January 2008 (oversight of fence



installation and groundwater sampling). Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report.

A discussion of the weekly activities appears below:

- During the week of December 17, 2007 (December 17 – 21, 2007), the primary activities that were performed centered on the shipment of waste materials that were generated during the investigation of the former maintenance trench during the week of June 4, 2007, and the grouting of the trench during the week of December 10, 2007. Field activities related to this effort were performed during the Site visit completed on December 21, 2007;
- The key activity completed during the week of December 24, 2007 was the submission of Status Report # 26 on December 26, 2007. No Site visits were initiated during the week of December 24, 2007;
- For the week of December 31, 2007, the Site-related activities primarily involved the attempts to schedule the Solutia-proposed groundwater sampling event and the additional fence installation activities. No Site visits were completed during the week;
- The continued coordination efforts towards scheduling the proposed on-Site (groundwater sampling and fence installation) activities were the focus of Site-related actions during the week of January 7, 2008. A supplemental Waste Shipment Notification letter was sent to Mr. Glenn Shankle of the Texas Department of Environmental Quality (TCEQ) on January 7, 2008, to address 2 drums of waste that were shipped from the Site on December 21, 2007. Those drums contained spent personal protective equipment (PPE), and materials (sediment, sludge and oil) recovered during the liquid removal effort completed from December 11 and 12, 2007. As with the previous week, no Site visits took place during the week of January 7, 2008;
- During the week of January 14, 2008, groundwater sampling and fence installation activities were completed at the RRG/Clayton Site. On January 14, 2008, after finalizing the schedule with counsel for Solutia, The Respondents notified U.S. EPA and OSC Kevin Turner of the projected completion schedule for the groundwater sampling and fence installation efforts that had been previously discussed. CRA personnel subsequently mobilized to the RRG/Clayton Site on January 16, 2008 to supervise the installation of additional security fencing at the Site, and to observe the collection of groundwater samples. The fence installation activities were completed on January 16 and 17, 2008, and involved the erection of a 6-foot high chain link fence topped by barbed wire that paralleled the existing Site fence at the southern portion of the east Site property line. CRA eventually collected 9 groundwater samples to duplicate those samples collected by personnel from Golder Associates, Inc., the environmental contractor for Solutia. These activities were completed between January 16 and 18, 2008. On January 18, 2008, Site security services were terminated as a result of the newly installed fence and the removal of all equipment and containerized waste from the Site;
- Site-related activities completed during the week of January 21, 2008, were mostly restricted to preparing the documents for Status Report # 27. No Site visits were completed during the week; and
- For the week of January 28, 2008, Site-related activities consisted of the finalization and submission of Status Report # 27. No project-related personnel were on Site during the week of January 28, 2008.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for December 17 – 21, 2007; Appendix B – Weekly

Summary of Site Activities for December 24 – 28, 2007; Appendix C – Weekly Summary of Site Activities for December 31, 2007 – January 4, 2008; Appendix D – Weekly Summary of Site Activities for January 7 –11, 2008; Appendix E – Weekly Summary of Site Activities for January 14 –18, 2008; Appendix F – Weekly Summary of Site Activities for January 21 –25, 2008; and Appendix G – Weekly Summary of Site Activities for January 28 – 31, 2008.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action as requested by The Respondents. This request was approved by OSC Turner on April 20, 2006. In January of 2007, STL merged with TestAmerica Laboratories, Inc. (TestAmerica) with the combined entity operating under the TestAmerica name/brand. TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

On January 16, 2008, CRA collected a groundwater sample from monitoring well MW-4S. This sample was done to duplicate the sample collected by Golder Associates, Inc. (Golder), on behalf of Solutia. A total of three groundwater samples, including a duplicate, were collected by CRA on January 17, 2008. Again, these samples were collected to duplicate those collected by Golder. The collected samples were from monitoring wells MW-4D (1 sample) and MW-4M (1 sample and 1 duplicate). On January 18, 2008, a total of 5 groundwater samples were collected from Geoprobe installed well points at two (2) locations. The approximate locations of these well points, which were installed to different depths with the intention of approximating the well screens from the MW-4 well cluster, are shown on the figure included with the weekly summary for January 14 – 18, 2008 (Appendix E of this report). A total of three samples were collected from the HP-1 location, with the remaining two samples coming from the HP-2 location.

Copies of results from the analysis of these samples will be submitted to U.S. EPA under separate cover from this Status Report.

The Analytical Report for the soil sample collected on December 10, 2007 is included as Appendix H of this report. Additionally, the Analytical Report for the soil sample collected on December 10, 2007 is included as Appendix I of this report.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through G of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

There was one notable issue that was encountered by CRA during the completion of the activities discussed in this report. The first issue was related to the intended area for the installation of the extended south Site fence. The target installation area was discovered to be located on the property of the neighboring American Bottoms (AB) facility. Additionally, it was discovered that the proposed fence layout would

restrict access to an AB manhole, that a fiber optic cable was located in the vicinity of the proposed connection point for the extended fence, and that the terrain in the vicinity of the proposed connection point was significantly sloped. Subsequently, the decision was made to modify the fence layout to parallel the existing eastern fence line for the southeast quadrant of the Site, which resulted in a connection point north of the originally proposed location.

No technical problems or issues are anticipated for the upcoming period since no on Site activities are anticipated.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

Analytical data from the split sampling of groundwater samples collected between January 16 and 18, 2008 will be submitted to U.S. EPA under separate cover.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (February 1, 2008 through March 1, 2008), no on Site activities are anticipated. Currently, the only anticipated Site-related actions are the preparation of an Annual Hazardous Waste Report for materials shipped from the Site in 2007.

4.2 SAMPLING AND ANALYSIS

No sampling activities are anticipated for the RRG/Clayton Site during the upcoming reporting period.

No analytical results are expected to be received during the upcoming reporting period since there are no outstanding data packages from previously collected samples, and no project-related samples are expected to be collected from the Site in the future.

4.3 REMOVAL ACTION WORK

The only activity expected to be performed and/or completed during the upcoming report period is the preparation of the 2007 Hazardous Waste Report, which must be submitted to the Illinois Environmental Protection Agency by March 1, 2008. An anticipated schedule for this activity appears below.

5.0 ANTICIPATED SCHEDULE

Please note that the dates presented below are projected dates and may be modified based on personnel availability, weather conditions or other factors. The Respondents will contact U.S. EPA prior to the initiation of all on-Site activities, or regarding any delays in the project timeline that would affect the ability of U.S. EPA or U.S. EPA designated personnel to perform oversight activities at the RRG/Clayton Site.

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Submit the 2007 Hazardous Waste Report	1 day	February 1, 2008

Attachments

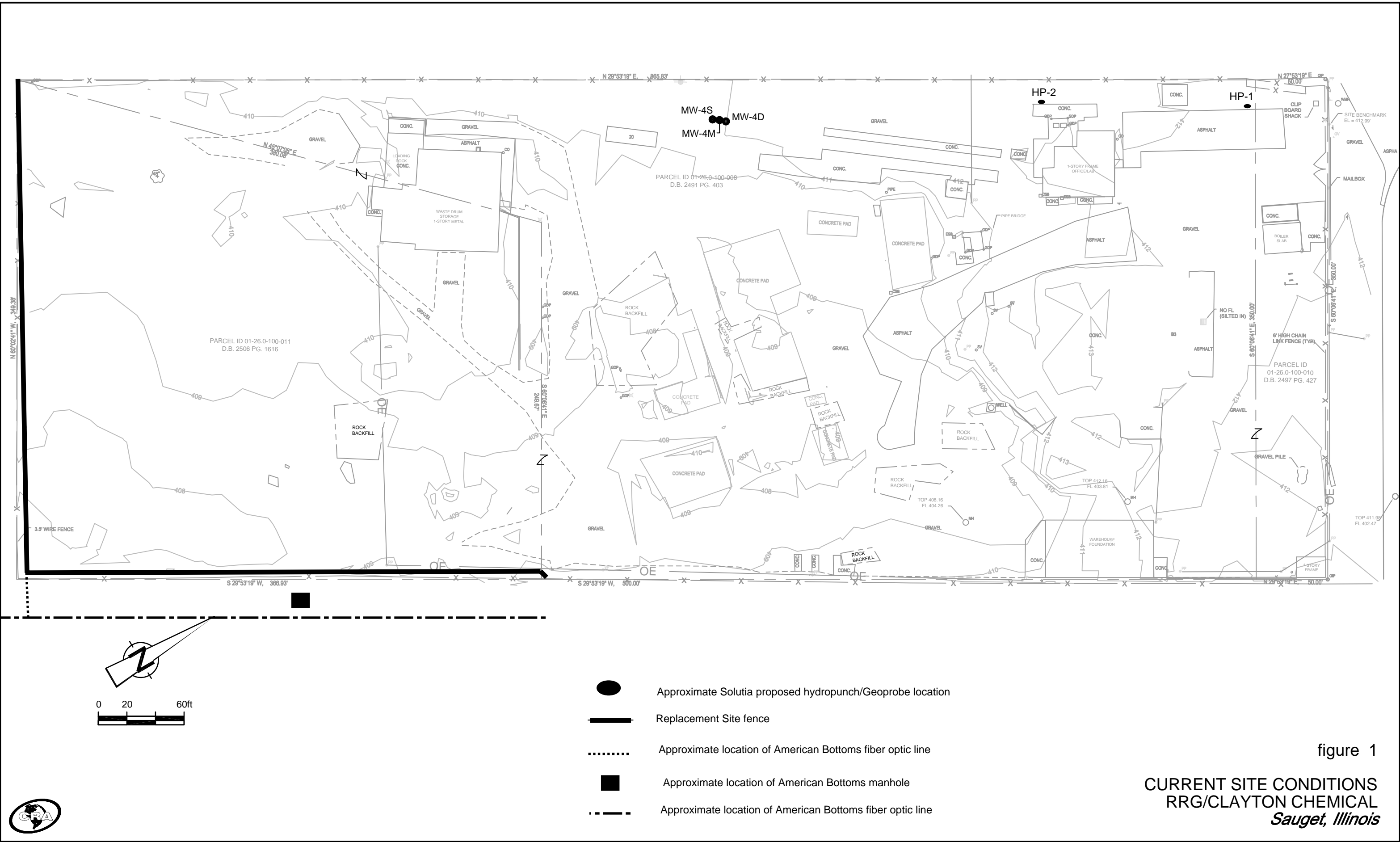


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 17 – 21, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/134 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For December 17 -21, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and seventh week (the period December 17 through 21, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 17, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 18, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 18, 2007	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents contacted U.S. EPA/OSC Kevin Turner via electronic mail and alerted him of the change in liquid disposal protocol and the intention to use a sub-contract firm to assist with liquid removal activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 20, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 20, 2007	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents provided U.S. EPA/OSC Turner with corporate Health and Safety documentation from Environmental Management Alternatives of St. Louis (EMA), the intended sub-contractor for the liquid removal actions. OSC Turner confirmed that he did not object to the use of the firm. The Respondents also alerted START Tom Binz and Illinois EPA representative Mike Grant of the liquid removal activities planned for December 21, 2007 per the directive of OSC Turner. A subsequent scheduling confirmation/update was later provided by The Respondents
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 21, 2007	Mobilization Activities	Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site along with a vacuum truck provided by Triad Transport, Inc. of McAlester, OK; personnel and a box truck from Veolia Environmental Services, Inc. (Veolia) Trade Waste Incinerator (TWI) facility of Sauget, IL; and personnel from EMA for waste shipment activities. 10 empty/unused 55-gallon drums that had been delivered to the Site on December 11, 2007 were transported back to the neighboring Veolia facility
	Project Coordination	START Tom Binz was on Site to observe Site activities. The Respondents submitted the required waste shipment notification letters to representatives of the Texas Commission of Environmental Quality (TCEQ) and Michigan Department of Environmental Quality (MDEQ) for the shipped liquids and empty drums, respectively

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 21, 2007	Site Preparation	Plastic sheeting was installed for staging the emptied drums prior to preparation for off-Site shipment
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	Approximately 1,900 gallons of liquids were pumped from 38 55-gallon drums into a vacuum truck for shipment to the Veolia Port Arthur facility in Port Arthur, TX for disposal. The empty drums were subsequently placed on pallets for shipment to the Environmental Quality Company (EQ) Wayne Disposal facility in Belleville, MI for disposal as a TSCA waste. Additionally, 2 drums containing sludge, sediments, and associated liquids recovered from the former maintenance trench, and used PPE were transported by Veolia for final disposal at the Veolia Port Arthur facility. The 30-cubic yard roll off box containing the soil stockpile from the June 2007 liquid investigation activities was taken off-Site for disposal as non-hazardous Special waste at the Milam Landfill facility in East St. Louis, IL. Additionally, two 16-ounce samples from the distillation tower formerly located in the facility production area were repackaged in a 5-gallon pail for shipment to the neighboring TWI facility. A cylinder of compressed isobutylene gas was also shipped to TWI for disposal

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

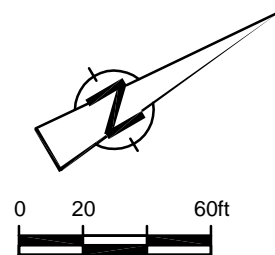
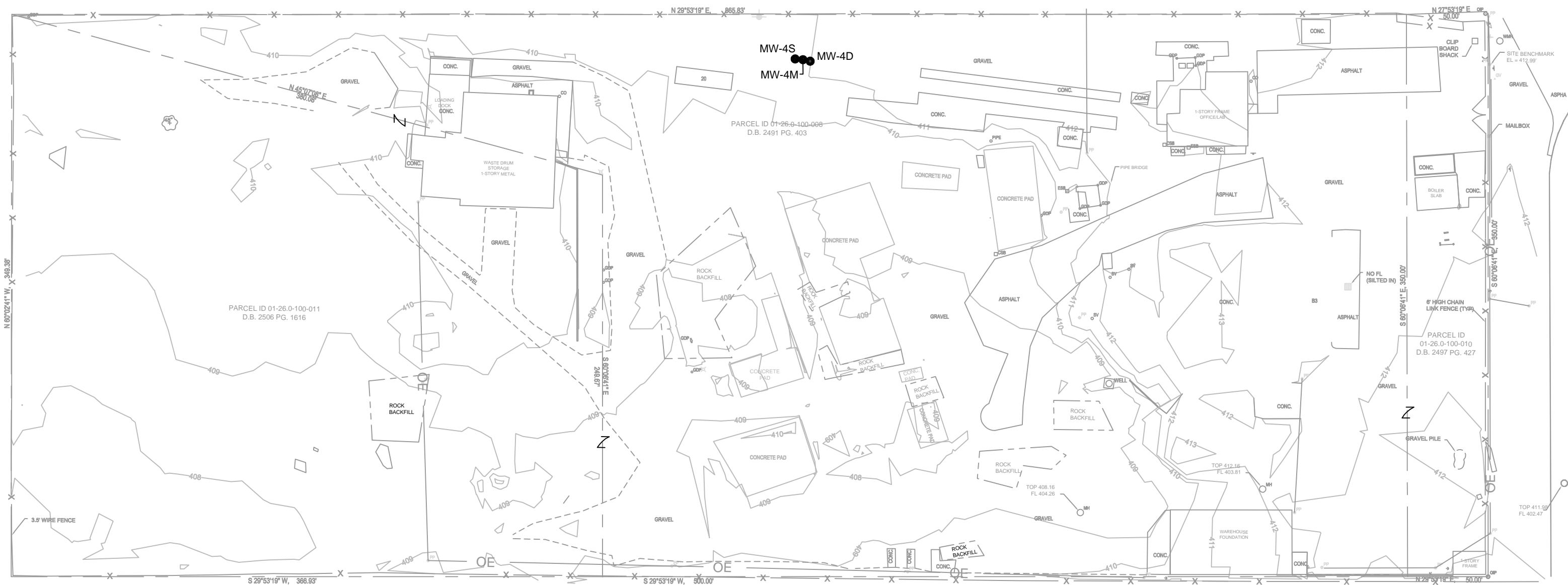


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 24 – 28, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/135 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For December 24 -28, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and eighth week (the period December 24 through 28, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 24, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 25, 2007	Mobilization Activities	No activity - Christmas Day
	Project Coordination	No activity - Christmas Day
	Site Preparation	No activity - Christmas Day

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 25, 2007	Asbestos Abatement	No activity - Christmas Day
	AST Sampling/Cleaning Removal	No activity - Christmas Day
	Drum Characterization/Disposal	No activity - Christmas Day
	Piping Draining/Disconnection	No activity - Christmas Day
	Process Equipment Decommissioning	No activity - Christmas Day
	Soil Sampling/Excavation	No activity - Christmas Day
	Miscellaneous	No activity - Christmas Day
Dec. 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents submitted Status Report # 26 to U.S. EPA/OSC Kevin Turner via electronic mail
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 27, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 27, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 28, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

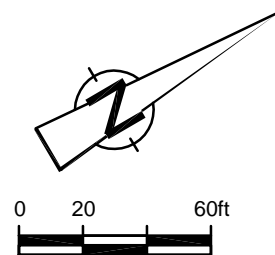
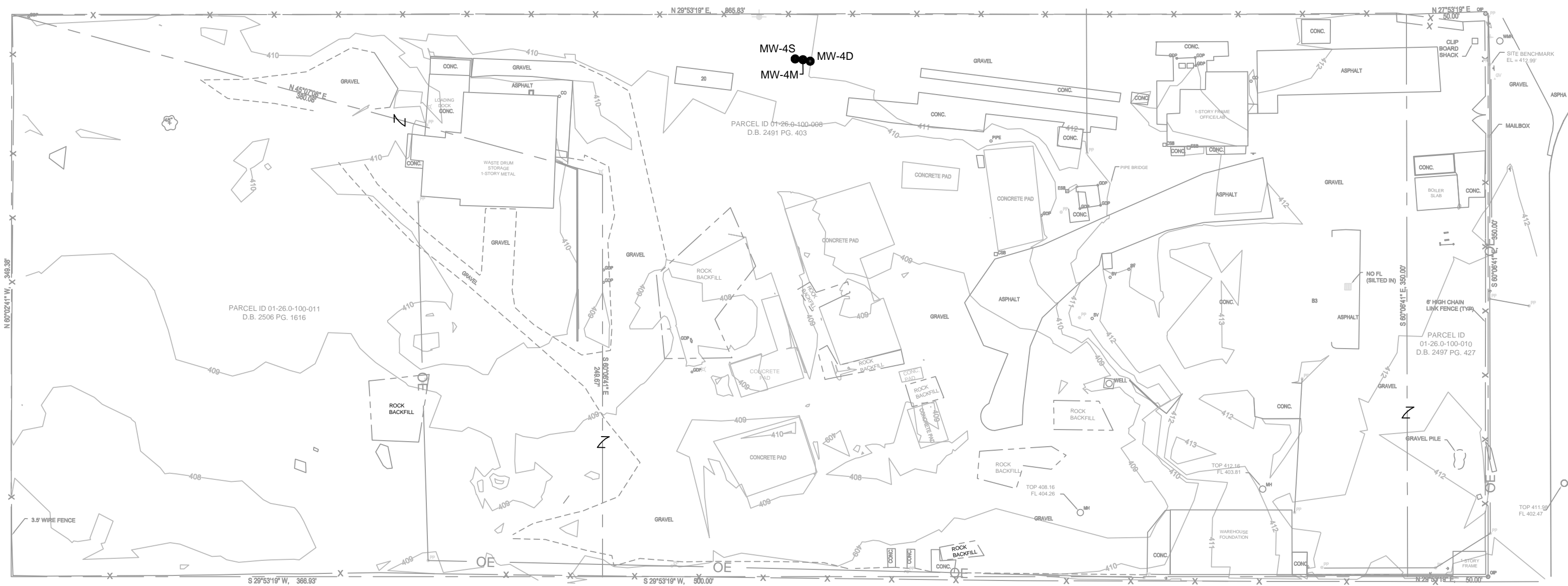


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 31, 2007 – JANUARY 4, 2008



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/136 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For December 31, 2007 -January 4, 2008**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and ninth week (the period December 31, 2007 through January 4, 2008) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 31, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 1, 2008	Mobilization Activities	No activity - New Year's Day
	Project Coordination	No activity - New Year's Day

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 1, 2008	Site Preparation	No activity - New Year's Day
	Asbestos Abatement	No activity - New Year's Day
	AST Sampling/Cleaning Removal	No activity - New Year's Day
	Drum Characterization/Disposal	No activity - New Year's Day
	Piping Draining/Disconnection	No activity - New Year's Day
	Process Equipment Decommissioning	No activity - New Year's Day
	Soil Sampling/Excavation	No activity - New Year's Day
	Miscellaneous	No activity - New Year's Day
January 2, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 3, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 3, 2008	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 4, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. CRA was contacted by START Thomas Binz regarding known upcoming events at the RRG/Clayton Site. CRA responded that the final schedule for the planned fence installation and groundwater sampling activities was being determined and that U.S. EPA/OSC Turner would be alerted by The Respondents once the final schedule was established. Additionally, START Binz was informed that no Site activities were anticipated beyond the fence and sampling activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

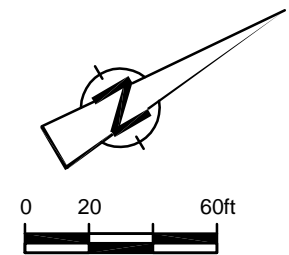
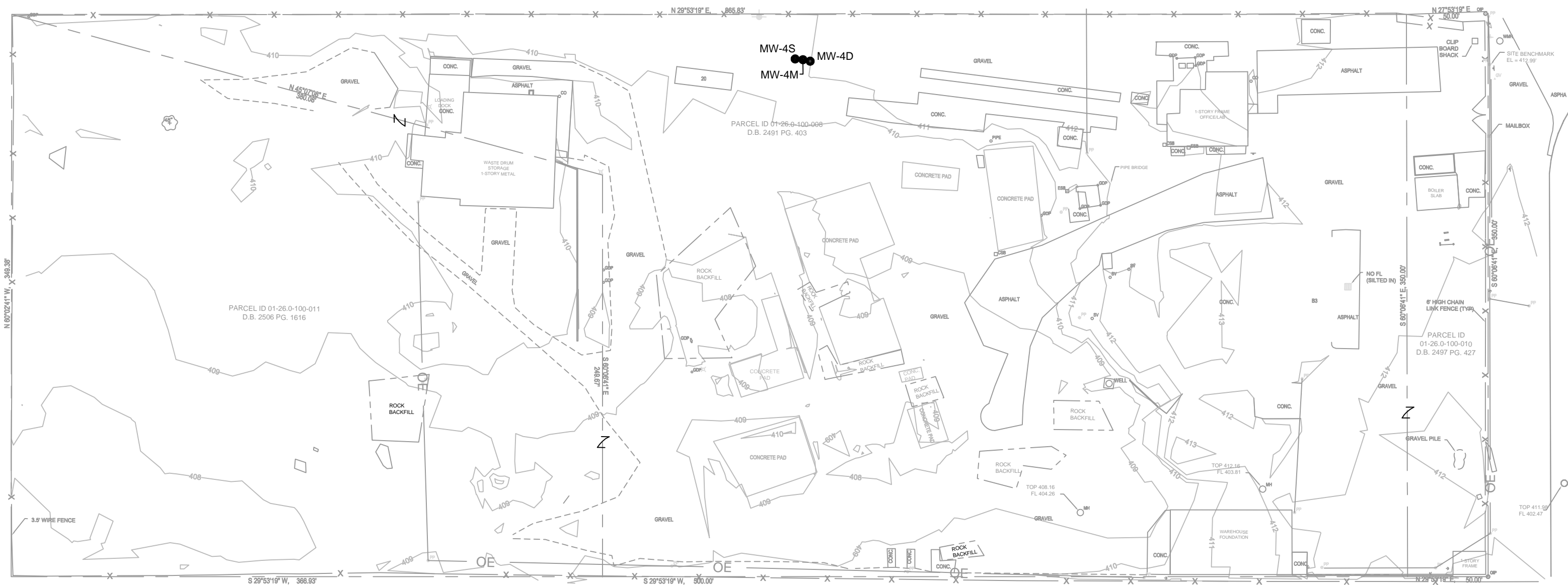


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 7 - 11, 2008



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/137 DATE: January 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For January 7 - 11, 2008**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and tenth week (the period January 7 through January 11, 2008) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 7, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents submitted a supplemental Waste Shipment Notification letter to the Texas Department of Environmental Quality (TCEQ) to address the two drums of sludge, sediment and spent personal protective equipment recovered and/or generated during liquid removal activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 7, 2008	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 8, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 9, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 10, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 10, 2008	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 11, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents received notification that the bulk liquids that were shipped on December 21, 2007 were received for disposal at the Veolia Port Arthur, Texas facility on December 24, 2007. Also, The Respondents received notification from EQ Wayne in Belleville, Michigan that the 38 empty drums that were shipped on December 21, 2007, were received for disposal on January 2, 2008

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

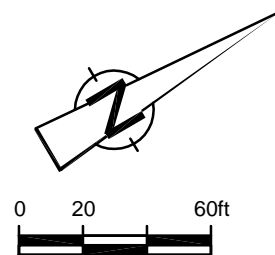
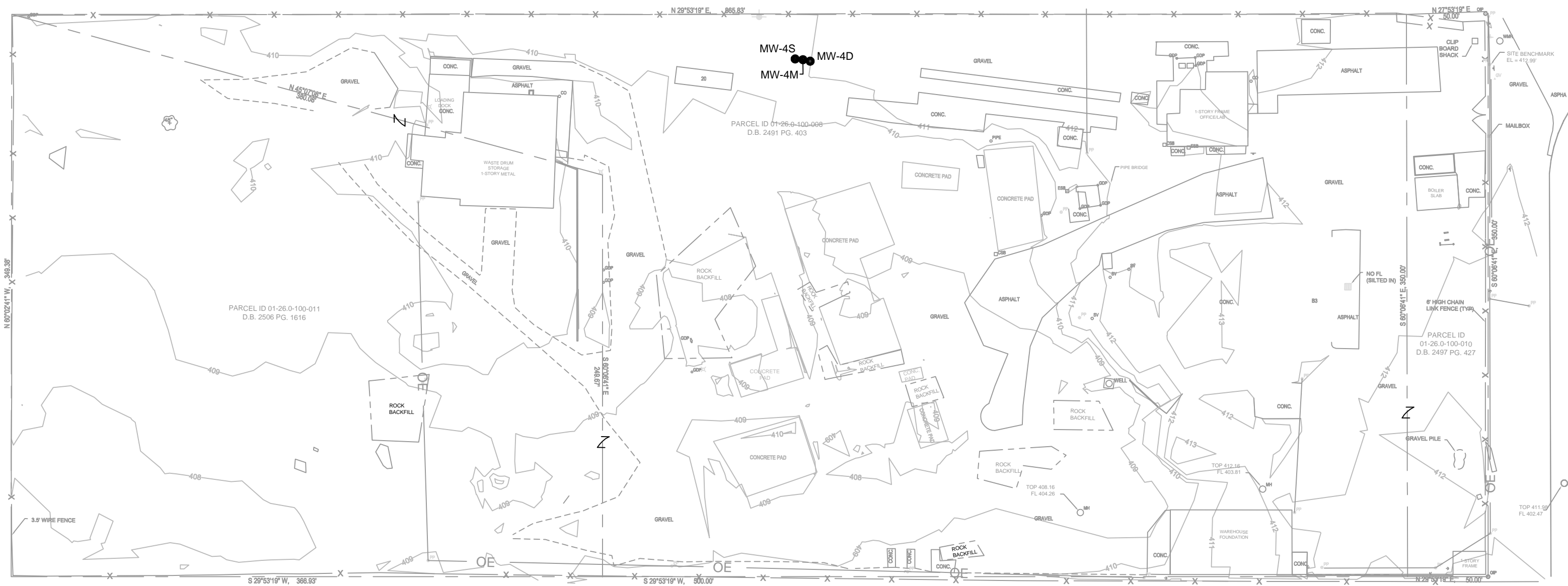


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 14 - 18, 2008



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/138 DATE: January 30, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For January 14 - 18, 2008**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and eleventh week (the period January 14 through January 18, 2008) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 14, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents informed U.S. EPA/OSC Kevin Turner that the fence installation and groundwater sampling activities had been scheduled for January 16 - 18, 2008 via electronic mail. START Tom Binz was also informed of the activity schedule
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 14, 2008	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 15, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 16, 2008	Mobilization Activities	Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site to oversee the installation of additional Site security fencing by Collins & Hermann (C&H), a fencing sub-contractor. Personnel from Golder Associates, Inc. (Golder) and Innovative Probing Solutions, Golder's Geoprobe contractor, also mobilized to the Site. Golder mobilized a Geoprobe 6610DT tracked unit and 10 55-gallon steel drums to the Site
	Project Coordination	START Tom Binz was on Site to observe the scheduled activities
	Site Preparation	C&H personnel cleared vegetation from the eastern portion of the Site where fencing activities were expected to take place
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 16, 2008	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	Following consultation with personnel from the neighboring American Bottoms (AB) facility, CRA modified the planned fencing scope of work from connecting to the existing AB fence to paralleling the farm fence along the Site's eastern property boundary (southeast quadrant). Subsequently, C&H personnel installed fencing hardware (posts, top rail and braces) along the southern portion of the Site's eastern border where fence replacement activities were deemed necessary. Golder explained that their planned activities involved collecting groundwater samples from the MW-4 well cluster; installing Geoprobe boreholes to profile soil stratigraphy at the 2 target locations (designated HP-1 and HP-2, see attached Site map) to a depth of 110 feet below ground surface (bgs), or the top of screen elevation for monitoring well MW-4D; and collecting groundwater samples from well points installed at each of the target locations to approximate the wells from the MW-4 cluster, i.e., 3 well points per location. CRA and Golder personnel collected a groundwater sample from monitoring well MW-4S. Golder and IPS personnel initiated Geoprobe activities at the HP-1 location to confirm Site stratigraphy
January 17, 2008	Mobilization Activities	No activity
	Project Coordination	START Binz was on Site to observe the scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 17, 2008	Miscellaneous	C&H personnel completed fence installation activities along the Site's eastern boundary with a total of 355 linear feet of fencing being installed before demobilizing from the Site. CRA and Golder personnel collected groundwater samples, including a duplicate, from monitoring wells MW-4D and MW-4M (a total of 3 samples). Golder and IPS personnel suspended continual soil profiling activities for the HP-1 location at 76' bgs, then collected a soil core from the 112 -116' interval. Golder and IPS personnel installed well points at the HP-1 location to approximate wells MW-4S and MW-4M, but were not able to collect samples
January 18, 2008	Mobilization Activities	CRA, Golder and IPS personnel demobilized from the Site. The IPS Geoprobe and the 55-gallon drums (empty and containing investigation derived wastes) were also demobilized from the Site
	Project Coordination	START Binz was on Site to observe the scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 18, 2008	Miscellaneous	Golder and IPS installed well points at the HP-2 location to correspond to the screen elevations of MW-4 S and MW-4M. A well point was also installed at the HP-1 location to correspond to MW-4D. All 6 boreholes that were initiated by IPS were backfilled/restored using bentonite. CRA and Golder collected groundwater samples from the 3 HP-1 well points and the 2 HP-2 well points for a total of 5 groundwater samples. Site security was terminated and the Site gates were secured with a padlock. The Respondents received confirmation that the liquid area soils that were shipped on December 21, 2007 were received at the Milam Landfill facility in East St. Louis, Illinois for disposal on December 21, 2007

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

APPENDIX F

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 21 – 25, 2008



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/139 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For January 21 - 25, 2008**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and twelfth week (the period January 21 through January 25, 2008) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 21, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 21, 2008	Miscellaneous	The Respondents received the signed waste manifest for the 38 empty drums that were shipped on December 21, 2007 for disposal at the EQ Wayne facility in Belleville, Michigan
January 22, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 23, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 24, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 24, 2008	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 25, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

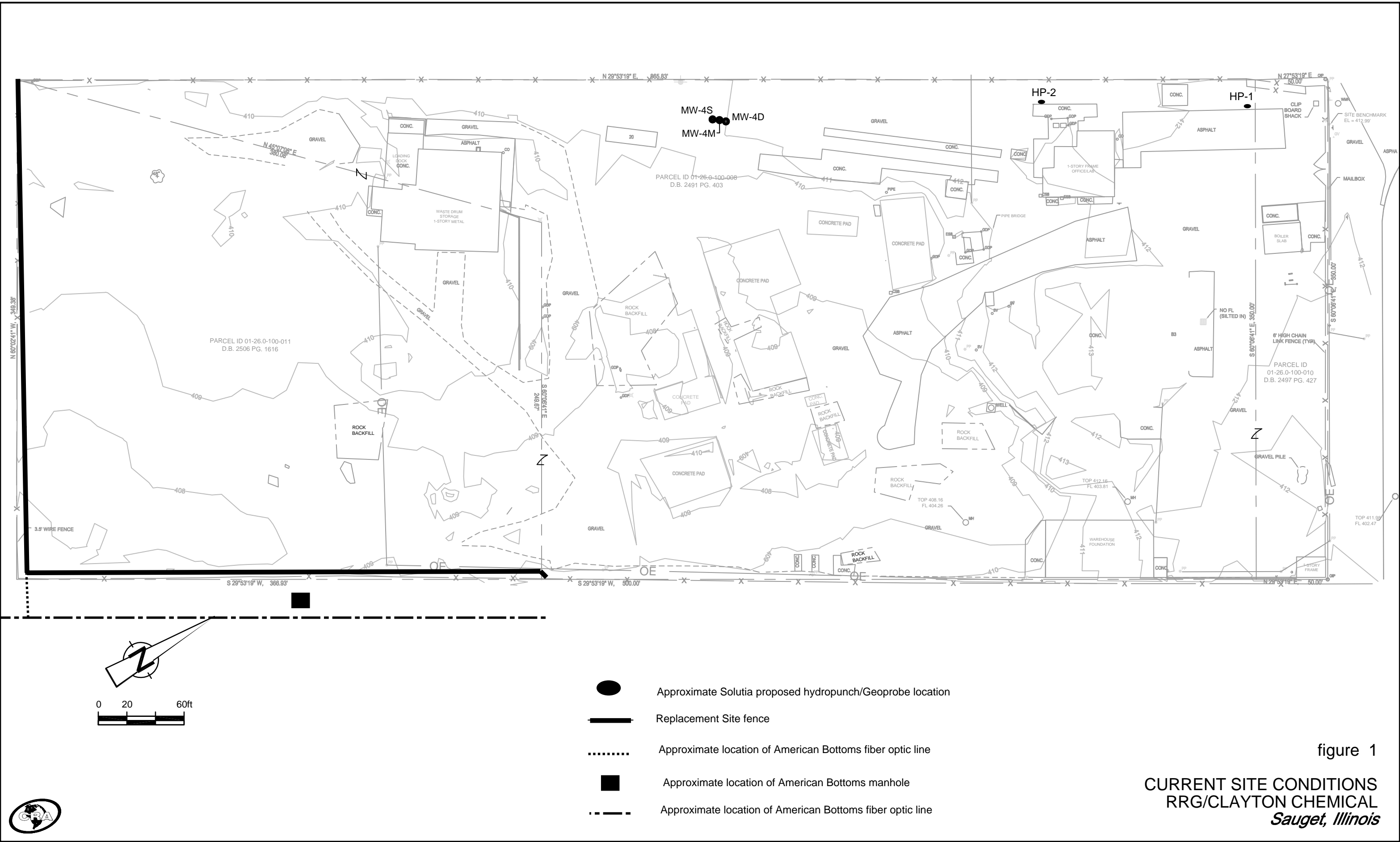


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX G

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 28 – 31, 2008



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/140 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: **Weekly Summary Of Site Activities For January 28 - 31, 2008**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and thirteenth week (the period January 28 through February 1, 2008) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 28, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The Respondents received the analytical reports for the groundwater samples collected from the Site on January 17 and 18, 2008

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 29, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	A review of the analytical results received on January 28, 2008 from the collected groundwater samples indicated that
January 30, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
January 31, 2008	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled activities. The Respondents submit Status Report # 27 to U.S. EPA/OSC Kevin Turner via electronic mail
	Site Preparation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 31, 2008	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

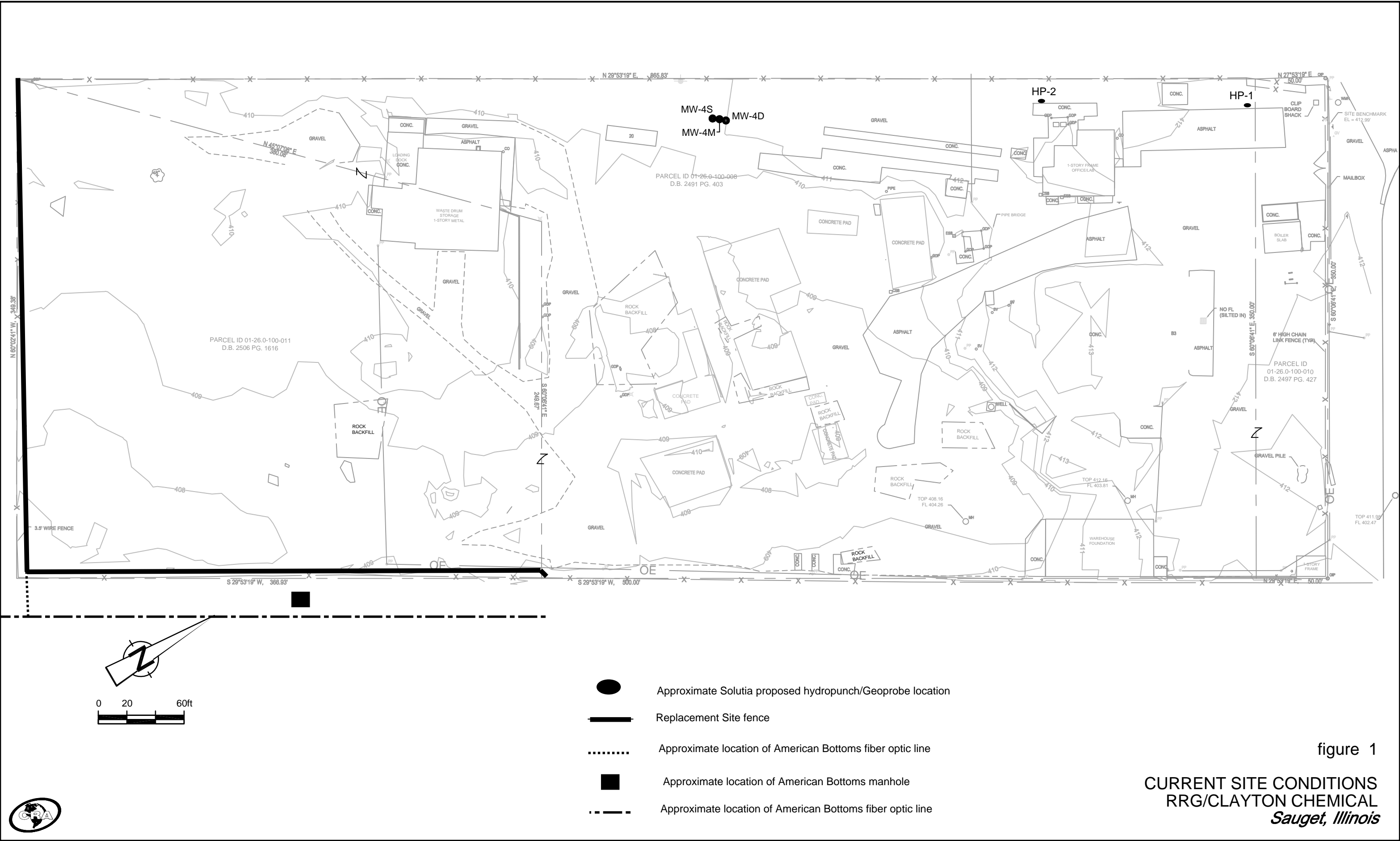


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX H

ANALYTICAL RESULTS FOR DECEMBER 10, 2007 SOIL SAMPLE

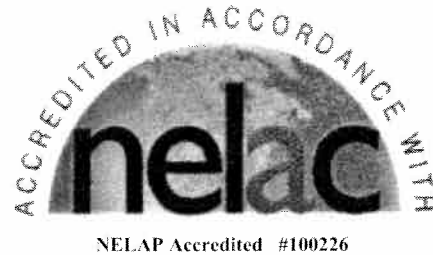
ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

December 14, 2007

Garth Daley
Conestoga-Rovers & Associates
8615 West Bryn Mawr Avenue
Chicago, IL 60631-3501
TEL: (773) 380-9933
FAX: (773) 380-6421



RE: Brandenburg, Sauget

WorkOrder: 07120286

Dear Garth Daley:

TEKLAB, INC received 1 sample on 12/10/2007 5:50:00 PM for the analysis presented in the following report.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in cursive script that reads "Heather A. White".

Heather A. White
Project Manager
(618)344-1004 ex.20

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates

Project: Brandenburg, Sauget

LabOrder: 07120286

Report Date: 14-Dec-07

CASE NARRATIVE

Cooler Receipt Temp: 6.0 °C

State accreditations:

IL: DPH #17584 NELAP #IL00045 | KS: NELAP #E-10347 | KY: UST #0073 | MO: DNR #00930 | AR: ADEQ #70-028-0

Qualifiers

DF - Dilution Factor

RL - Reporting Limit

ND - Not Detected at the Reporting Limit

Surr - Surrogate Standard added by lab

TNTC - Too numerous to count (> 200 CFU)

Q - QC criteria failed or noncompliant CCV

NELAP - IL ELAP and NELAP Accredited Field of Testing

B - Analyte detected in the associated Method Blank

J - Analyte detected below reporting limits

R - RPD outside accepted recovery limits

S - Spike Recovery outside accepted recovery limits

X - Value exceeds Maximum Contaminant Level

- Unknown hydrocarbon

IDPH - IL Dept. of Public Health

C - Client requested RL below

D - Diluted out of sample

E - Value above quantitation range

H - Holding time exceeded

MI - Matrix interference

DNI - Did not ignite

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates
WorkOrder: 07120286
Lab ID: 07120286-001
Report Date: 14-Dec-07

Client Project: Brandenburg, Sauget
Client Sample ID: S-121007-GD-029
Collection Date: 12/10/2007 4:00:00 PM
Matrix: SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
ASTM D4979-95								
Color		0		Brown-Gray		1	12/11/2007	NJK
Layering		0		None		1	12/11/2007	NJK
Odor		0		None		1	12/11/2007	NJK
Physical State		0		See Comment		1	12/11/2007	NJK
Turbidity		0		N/A		1	12/11/2007	NJK
Viscosity		0		N/A		1	12/11/2007	NJK
ASTM D5058-90								
Water Reactivity		0		None		1	12/11/2007	NJK
ASTM D92								
Ignitability, Open Cup		60		>200	°F	1	12/13/2007	BSJ
STANDARD METHODS 18TH ED. 2540 G								
Total Solids		0.1		99.0	%	1	12/11/2007	MVS
SW-846 1311, 3010A, 6010B, METALS IN TCLP EXTRACT BY ICP								
Arsenic	NELAP	0.250		< 0.250	mg/L	1	12/13/2007 2:03:03 PM	LAL
Barium	NELAP	0.0500		0.627	mg/L	1	12/13/2007 2:03:03 PM	LAL
Cadmium	NELAP	0.0200		0.0260	mg/L	1	12/13/2007 2:03:03 PM	LAL
Chromium	NELAP	0.100		0.112	mg/L	1	12/13/2007 2:03:03 PM	LAL
Lead	NELAP	0.400	J	0.21	mg/L	1	12/13/2007 2:03:03 PM	LAL
Selenium	NELAP	0.500		< 0.500	mg/L	1	12/13/2007 2:03:03 PM	LAL
Silver	NELAP	0.100		< 0.100	mg/L	1	12/13/2007 2:03:03 PM	LAL
SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS								
2,4,5-Trichlorophenol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
2,4,6-Trichlorophenol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
2,4-Dinitrotoluene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Cresols, Total	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Hexachlorobenzene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Hexachlorobutadiene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Hexachloroethane	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
m,p-Cresol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Nitrobenzene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
o-Cresol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Pentachlorophenol	NELAP	0.080		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Pyridine	NELAP	0.080		ND	mg/L	1	12/12/2007 6:51:00 PM	TDN
Surr: 2,4,6-Tribromophenol		27.7-149		84.5	%REC	1	12/12/2007 6:51:00 PM	TDN
Surr: 2-Fluorobiphenyl		44.9-116		77.1	%REC	1	12/12/2007 6:51:00 PM	TDN
Surr: 2-Fluorophenol		10.6-78.7		52.3	%REC	1	12/12/2007 6:51:00 PM	TDN
Surr: Nitrobenzene-d5		41.4-104		73.9	%REC	1	12/12/2007 6:51:00 PM	TDN
Surr: Phenol-d5		9.04-52.9		29.6	%REC	1	12/12/2007 6:51:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates

Client Project: Brandenburg, Sauget

WorkOrder: 07120286

Client Sample ID: S-121007-GD-029

Lab ID: 07120286-001

Collection Date: 12/10/2007 4:00:00 PM

Report Date: 14-Dec-07

Matrix: SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<u>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</u>								
Surr: p-Terphenyl-d14		23.5-114		70.9	%REC	1	12/12/2007 6:51:00 PM	TDN
<u>SW-846 1311, 5030, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS</u>								
1,1-Dichloroethene	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
1,2-Dichloroethane	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
1,4-Dichlorobenzene	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
2-Butanone	NELAP	2.50		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Benzene	NELAP	0.100		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Carbon tetrachloride	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Chlorobenzene	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Chloroform	NELAP	0.250		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Tetrachloroethene	NELAP	0.250	S	ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Trichloroethene	NELAP	0.250	S	ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Vinyl chloride	NELAP	0.100		ND	mg/L	50	12/12/2007 4:52:00 PM	CCF
Surr: 1,2-Dichloroethane-d4		68.8-131		93.3	%REC	50	12/12/2007 4:52:00 PM	CCF
Surr: 4-Bromofluorobenzene		83.9-114		102.7	%REC	50	12/12/2007 4:52:00 PM	CCF
Surr: Dibromofluoromethane		74.4-127		99.1	%REC	50	12/12/2007 4:52:00 PM	CCF
Surr: Toluene-d8		84.6-115		96.5	%REC	50	12/12/2007 4:52:00 PM	CCF
<u>SW-846 1311, 7470A IN TCLP EXTRACT</u>								
Mercury	NELAP	0.00020		< 0.00020	mg/L	1	12/13/2007	MEK
<u>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</u>								
Aroclor 1016	NELAP	364		1030	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Aroclor 1221	NELAP	364		ND	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Aroclor 1232	NELAP	364		ND	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Aroclor 1242	NELAP	364		ND	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Aroclor 1248	NELAP	364		ND	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Aroclor 1254	NELAP	364		5010	µg/Kg	10	12/13/2007 12:29:00 PM	HE
Aroclor 1260	NELAP	364		4050	µg/Kg	10	12/13/2007 11:01:00 AM	HE
Surr: Decachlorobiphenyl		5-156		109.5	%REC	1	12/12/2007 8:22:00 PM	HE
Surr: Tetrachloro-meta-xylene		7.35-123		69.5	%REC	1	12/12/2007 8:22:00 PM	HE
<u>SW-846 9010B, 9014</u>								
Cyanide	NELAP	0.49		1.46	mg/Kg	1	12/13/2007	MVS
<u>SW-846 9023</u>								
Extractable Organic Halogens (EOX)		10.0		< 10.0	mg/Kg	1	12/13/2007	SUB
<u>SW-846 9034 (REACTIVE)</u>								
Sulfide, Reactive	NELAP	9.9		< 9.9	mg/Kg	1	12/12/2007	NJK
<u>SW-846 9045C</u>								
pH (1:1)	NELAP	1.00		7.58		1	12/11/2007 2:21:00 PM	KNL
<u>SW-846 9065</u>								

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates

WorkOrder: 07120286

Lab ID: 07120286-001

Report Date: 14-Dec-07

Client Project: Brandenburg, Sauget

Client Sample ID: S-121007-GD-029

Collection Date: 12/10/2007 4:00:00 PM

Matrix: SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<u>SW-846 9065</u>								
Phenols	NELAP	0.390		1.40	mg/Kg	1	12/12/2007	AET
<u>SW-846 9095</u>								
Paint Filter	NELAP	0		Pass	Pass/Fail	1	12/11/2007	KNL

Sample Narrative

ASTM D4979-95

Physical State: Granular Solid; fine sand to 2cm rocks

SW-846 9023

Analysis performed by Keystone Laboratories, Inc.

SW-846 3550B, 8082, PolyChlorinated Biphenyls (PCBs) by GC/ECD

Elevated reporting limit due to high levels of target and/or non-target analytes.

SW-846 1311, 5030, 8260B, Volatile Organic Compounds in TCLP Extract by GC/MS

Matrix spike did not recover within control limits.

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates
Project: Brandenburg, Sauget
Lab Order: 07120286
Report Date: 14-Dec-07

RECEIVING CHECK LIST

Carrier: Garth Daley

Received By: TAL

Completed by: *Marvin L. Darling II*

Reviewed by: *Elizabeth A. Hurley*

On:

On:

11-Dec-07

11-Dec-07

Marvin L. Darling

Elizabeth A. Hurley

Pages to follow: Chain of custody

Extra pages included

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>	Temp °C 6.0
Custody seals intact on shipping container/cooler?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>	
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>	
Type of thermal preservation?	None <input type="checkbox"/>	Ice <input checked="" type="checkbox"/>	Blue Ice <input type="checkbox"/>	Dry Ice <input type="checkbox"/>
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Reported field parameters measured:	Field <input type="checkbox"/>	Lab <input type="checkbox"/>	NA <input checked="" type="checkbox"/>	
Container/Temp Blank temperature in compliance?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		

When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.

Water - VOA vials have zero headspace?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No VOA vials submitted <input checked="" type="checkbox"/>
Water - pH acceptable upon receipt?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	

Any No responses must be detailed below or on the COC.

APPENDIX I

ANALYTICAL RESULTS FOR DECEMBER 10, 2007 LIQUID SAMPLE

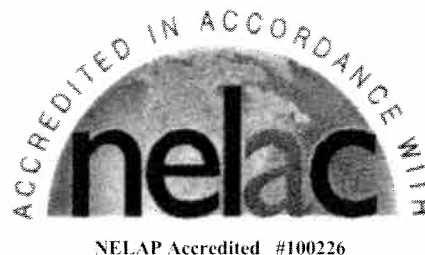
ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

December 14, 2007

Garth Daley
Conestoga-Rovers & Associates
8615 West Bryn Mawr Avenue
Chicago, IL 60631-3501
TEL: (773) 380-9933
FAX: (773) 380-6421



RE: Brandenburg, Sauget

WorkOrder: 07120285

Dear Garth Daley:

TEKLAB, INC received 1 sample on 12/10/2007 5:50:00 PM for the analysis presented in the following report.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in cursive script that reads "Heather A. White".

Heather A. White
Project Manager
(618)344-1004 ex.20

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates

Project: Brandenburg, Sauget

LabOrder: 07120285

Report Date: 14-Dec-07

CASE NARRATIVE

Cooler Receipt Temp: 5.8 °C

State accreditations:

IL: DPH #17584 NELAP #IL00045 | KS: NELAP #E-10347 | KY: UST #0073 | MO: DNR #00930 | AR: ADEQ #70-028-0

Qualifiers

DF - Dilution Factor

RL - Reporting Limit

ND - Not Detected at the Reporting Limit

Surr - Surrogate Standard added by lab

TNTC - Too numerous to count (> 200 CFU)

Q - QC criteria failed or noncompliant CCV

NELAP - IL ELAP and NELAP Accredited Field of Testing

B - Analyte detected in the associated Method Blank

J - Analyte detected below reporting limits

R - RPD outside accepted recovery limits

S - Spike Recovery outside accepted recovery limits

X - Value exceeds Maximum Contaminant Level

- Unknown hydrocarbon

IDPH - IL Dept. of Public Health

C - Client requested RL below

D - Diluted out of sample

E - Value above quantitation range

H - Holding time exceeded

MI - Matrix interference

DNI - Did not ignite

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates
WorkOrder: 07120285
Lab ID: 07120285-001
Report Date: 14-Dec-07

Client Project: Brandenburg, Sauget
Client Sample ID: OIL-121007-GD-003
Collection Date: 12/10/2007 3:45:00 PM
Matrix: LIQUID WASTE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
ASTM D4979-95								
Color		0		See comment		1	12/11/2007	NJK
Layering		0		See comment		1	12/11/2007	NJK
Odor		0		See comment		1	12/11/2007	NJK
Physical State		0		None		1	12/11/2007	NJK
Turbidity		0		None		1	12/11/2007	NJK
Viscosity		0		See comment		1	12/11/2007	NJK
ASTM D5058-90								
Water Reactivity		0		None		1	12/11/2007	NJK
ASTM D92								
Ignitability, Open Cup		60	X	187	°F	1	12/13/2007	BSJ
STANDARD METHODS 18TH ED. 2540 G								
Total Solids		0.1		0.3	%	1	12/11/2007	MVS
SW-846 1311, 3010A, 6010B, METALS IN TCLP EXTRACT BY ICP								
Arsenic	NELAP	0.250		< 0.250	mg/L	1	12/13/2007 12:45:18 PM	LAL
Barium	NELAP	0.0500	J	0.045	mg/L	1	12/13/2007 12:45:18 PM	LAL
Cadmium	NELAP	0.0200		< 0.0200	mg/L	1	12/13/2007 12:45:18 PM	LAL
Chromium	NELAP	0.100		< 0.100	mg/L	1	12/13/2007 12:45:18 PM	LAL
Lead	NELAP	0.400		< 0.400	mg/L	1	12/13/2007 12:45:18 PM	LAL
Selenium	NELAP	0.500		< 0.500	mg/L	1	12/13/2007 12:45:18 PM	LAL
Silver	NELAP	0.100		< 0.100	mg/L	1	12/13/2007 12:45:18 PM	LAL
SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS								
2,4,5-Trichlorophenol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
2,4,6-Trichlorophenol	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
2,4-Dinitrotoluene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
Cresols, Total	NELAP	0.040		0.693	mg/L	1	12/12/2007 6:14:00 PM	TDN
Hexachlorobenzene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
Hexachlorobutadiene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
Hexachloroethane	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
m,p-Cresol	NELAP	0.040		0.630	mg/L	1	12/12/2007 6:14:00 PM	TDN
Nitrobenzene	NELAP	0.040		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
o-Cresol	NELAP	0.040		0.064	mg/L	1	12/12/2007 6:14:00 PM	TDN
Pentachlorophenol	NELAP	0.080		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
Pyridine	NELAP	0.080		ND	mg/L	1	12/12/2007 6:14:00 PM	TDN
Surr: 2,4,6-Tribromophenol		27.7-149		90.6	%REC	1	12/12/2007 6:14:00 PM	TDN
Surr: 2-Fluorobiphenyl		44.9-116		78.4	%REC	1	12/12/2007 6:14:00 PM	TDN
Surr: 2-Fluorophenol		10.6-78.7		56.9	%REC	1	12/12/2007 6:14:00 PM	TDN
Surr: Nitrobenzene-d5		41.4-104		70.1	%REC	1	12/12/2007 6:14:00 PM	TDN
Surr: Phenol-d5		9.04-52.9		38.5	%REC	1	12/12/2007 6:14:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates

WorkOrder: 07120285

Lab ID: 07120285-001

Report Date: 14-Dec-07

Client Project: Brandenburg, Sauget

Client Sample ID: OIL-121007-GD-003

Collection Date: 12/10/2007 3:45:00 PM

Matrix: LIQUID WASTE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<u>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</u>								
Surr: p-Terphenyl-d14		23.5-114		66.7	%REC	1	12/12/2007 6:14:00 PM	TDN
<u>SW-846 1311, 5030, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS</u>								
1,1-Dichloroethene	NELAP	0.500		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
1,2-Dichloroethane	NELAP	0.500		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
1,4-Dichlorobenzene	NELAP	0.500	J	0.11	mg/L	100	12/12/2007 2:53:00 PM	CCF
2-Butanone	NELAP	5.00		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Benzene	NELAP	0.200		0.244	mg/L	100	12/12/2007 2:53:00 PM	CCF
Carbon tetrachloride	NELAP	0.500		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Chlorobenzene	NELAP	0.500		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Chloroform	NELAP	0.500		ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Tetrachloroethene	NELAP	0.500	S	ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Trichloroethene	NELAP	0.500	S	ND	mg/L	100	12/12/2007 2:53:00 PM	CCF
Vinyl chloride	NELAP	0.200	X	0.667	mg/L	100	12/12/2007 2:53:00 PM	CCF
Surr: 1,2-Dichloroethane-d4		68.8-131		95.1	%REC	100	12/12/2007 2:53:00 PM	CCF
Surr: 4-Bromofluorobenzene		83.9-114		102.8	%REC	100	12/12/2007 2:53:00 PM	CCF
Surr: Dibromofluoromethane		74.4-127		99.7	%REC	100	12/12/2007 2:53:00 PM	CCF
Surr: Toluene-d8		84.6-115		94.9	%REC	100	12/12/2007 2:53:00 PM	CCF
<u>SW-846 1311, 7470A IN TCLP EXTRACT</u>								
Mercury	NELAP	0.00020		< 0.00020	mg/L	1	12/13/2007	MEK
<u>SW-846 3580A, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</u>								
Aroclor 1016		149		322	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1221		149		ND	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1232		149		ND	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1242		149		ND	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1248		149		ND	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1254		149		1110	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Aroclor 1260		149		872	mg/Kg	100	12/12/2007 3:34:00 PM	HE
Surr: Decachlorobiphenyl		10-176	S	0	%REC	100	12/12/2007 3:34:00 PM	HE
Surr: Tetrachloro-meta-xylene		33-178	S	0	%REC	100	12/12/2007 3:34:00 PM	HE
<u>SW-846 9010B, 9014</u>								
Cyanide	NELAP	0.47		0.52	mg/Kg	1	12/13/2007	MVS
<u>SW-846 9023</u>								
Total Halogens (TX)		10		3200	mg/Kg	1	12/13/2007	SUB
<u>SW-846 9034 (REACTIVE)</u>								
Sulfide, Reactive	NELAP	9.9		< 9.9	mg/Kg	1	12/12/2007	NJK
<u>SW-846 9045C</u>								
pH (1:1)	NELAP	1.00		5.97		1	12/11/2007 2:25:00 PM	KNL
<u>SW-846 9065</u>								

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

LABORATORY RESULTS

Client: Conestoga-Rovers & Associates

WorkOrder: 07120285

Lab ID: 07120285-001

Report Date: 14-Dec-07

Client Project: Brandenburg, Sauget

Client Sample ID: OIL-121007-GD-003

Collection Date: 12/10/2007 3:45:00 PM

Matrix: LIQUID WASTE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<u>SW-846 9065</u>								
Phenols	NELAP	0.782		24.5	mg/Kg	2	12/12/2007	AET
<u>SW-846 9095</u>								
Paint Filter	NELAP	0		Fail	Pass/Fail	1	12/11/2007	KNL

Sample Narrative

ASTM D4979-95

Sample was bi-phasic. Bottom layer comprised approx. 80% of volume. Had slight petroleum odor, was clear, and was a low viscosity liquid. Top layer had a strong petroleum odor, was golden-black, and was a medium viscosity oil.

SW-846 9023

Analysis performed by Keystone Laboratories, Inc.

SW-846 3580A, 8082, PolyChlorinated Biphenyls (PCBs) by GC/ECD

Surrogate recovery was outside QC limits due to sample dilution.

MS & MSD recovery was outside QC limits due to sample dilution.

SW-846 1311, 5030, 8260B, Volatile Organic Compounds in TCLP Extract by GC/MS

Matrix spike did not recover within control limits.

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates
Project: Brandenburg, Sauget
Lab Order: 07120285
Report Date: 14-Dec-07

RECEIVING CHECK LIST

Carrier: Garth Daley

Received By: TAL

Completed by: *Marvin L. Darling II*
On: 11-Dec-07
Marvin L. Darling

Reviewed by: *Elizabeth A. Hurley*
On: 11-Dec-07
Elizabeth A. Hurley

Pages to follow: Chain of custody

Extra pages included

Shipping container/cooler in good condition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Not Present <input type="checkbox"/>	Temp °C 5.8
Custody seals intact on shipping container/cooler?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>	
Custody seals intact on sample bottles?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Not Present <input checked="" type="checkbox"/>	
Type of thermal preservation?	None <input type="checkbox"/>	Ice <input checked="" type="checkbox"/>	Blue Ice <input type="checkbox"/>	Dry Ice <input type="checkbox"/>
Chain of custody present?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody signed when relinquished and received?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Chain of custody agrees with sample labels?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Samples in proper container/bottle?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sample containers intact?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Sufficient sample volume for indicated test?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
All samples received within holding time?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
Reported field parameters measured:	Field <input type="checkbox"/>	Lab <input type="checkbox"/>	NA <input checked="" type="checkbox"/>	
Container/Temp Blank temperature in compliance?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		
<div style="border: 1px solid black; padding: 5px;"> <p><i>When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.</i></p> </div>				
Water - VOA vials have zero headspace?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No VOA vials submitted <input checked="" type="checkbox"/>	
Water - pH acceptable upon receipt?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>		

Any No responses must be detailed below or on the COC.